

**United States Bankruptcy Court  
Eastern District of Pennsylvania**

In re:

Tri-State Paper, Inc.,

Plaintiff.

Case No. 23-13237-pmm

Chapter 11

Tri-State Paper, Inc.,

Plaintiff,

v.

John Does #1-2,

Defendants.

Adversary No. 23-00090-pmm

**Plaintiff's Motion to Compel Discovery by Early Warning Services, LLC**

**AND NOW**, Plaintiff Tri-State Paper, Inc., by and through its attorney, states as follows:

1. On December 18, 2023, the Plaintiff served a subpoena to produce documents, information, or objects on Early Warning Services, LLC pursuant to Fed R. Bankr. P. 9016 and Fed. R. Civ. P. 45, with a response date of January 2, 2024. Exhibit A.
2. EWS received the subpoena on December 26, 2023. Exhibit B.
3. EWS has failed to respond to the subpoena.
4. The Court must enter an order compelling EWS to comply with the subpoena.

**NOW, THEREFORE**, the Plaintiff asks the Court to grant relief in the form of order attached, and further in its favor if necessary and proper under the law.

Date: January 12, 2024

CIBIK LAW, P.C.  
*Counsel for Plaintiff*

By: /s/ Michael I. Assad  
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**Certification by Debtor's Counsel**

As it pertains to the Plaintiff's Motion to Compel Discovery by Early Warning Services, LLC, I certify that I attempted to confer with the party failing to make discovery in an effort to obtain it without court action. I certify under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Date: January 12, 2024

/s/ Michael I. Assad  
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